

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JACOB and JAMES JUNG, as	:	
Administrators of the Estate of LOUIS	:	
JUNG, JR,	:	No. 2:24-cv-05618-TJS
:		
Plaintiff,	:	
:		
v.	:	
:		
CITY OF PHILADELPHIA; YesCare Corp.;	:	JURY TRIAL DEMANDED
BLANCHE CARNEY, Former	:	
Commissioner of Philadelphia Dept. of	:	
Prisons; LALITHA TRIVIKRAM;	:	
MAUREEN GAY; Correctional Officer John	:	
Does 1-10,	:	
:		
Defendants.	:	

CERTIFICATE OF MERIT

I, Bret Grote, Esquire, certify that:

An appropriate licensed physician and expert in diabetes care, Louis Phillipson, M.D., Ph.D, has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by defendant Dr. Lalitha Trivikram in the above-captioned action in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm.

Respectfully submitted,

/s/ *Bret Grote*
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